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—
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October 14, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
Daniel P. Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Pham*,
12 Cr. 423 (AJN)

Dear Judge Nathan:

This letter is submitted on behalf of defendant Minh Quang Pham, whom Bobbi C. Sternheim, Esq., and I represent in the above-entitled matter. Currently Mr. Pham's Reply to the government's opposition to his pretrial motions is due tomorrow, October 15, 2021. However, for the reasons set forth below, it is respectfully requested that the due date for Mr. Pham's Reply be extended until October 25, 2021. I have been in contact with Assistant United States Attorney David W. Denton, Jr., and he has informed me the government does not object to this application.

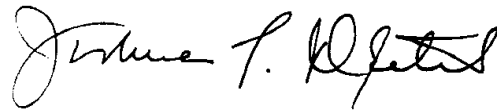
As the Court is aware, Mr. Pham is confined at the U.S. Bureau of Prisons' Administrative Maximum ("ADX") facility in Florence, Colorado. He is also subject to Special Administrative Measures ("S.A.M.'s"). Both factors make arranging and achieving communication with Mr. Pham cumbersome and time-consuming at best. We have been attempting to arrange a telephone call with Mr. Pham to discuss the government's opposition and the Reply, and it appears we will be able to do so for next week. This week would almost certainly have been fruitless anyway because, given the S.A.M.'s and the general present state of the U.S. mail, it is unlikely (from past experience) that he has received the government's opposition, which was mailed to him earlier this week. The extension of time would therefore permit counsel to discuss the Reply with Mr. Pham in a meaningful manner.

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Accordingly, it is respectfully requested that the Court extend the time for filing of Mr. Pham's Reply until October 25, 2021. As noted above, the government does not object to this application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua L. Dratel", written in a cursive style.

Joshua L. Dratel

JLD/